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TECHNOLOGY LICENSING CORP.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TECHNOLOGY LICENSING
CORPORATION,

Plaintiff,

v.

GRASS VALLEY USA, LLC,

Defendant.

AND RELATED COUNTERCLAIMS

Case No. 5:12-cv-06060-EJD
AMENDED

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO
RESCHEDULE CASE
MANAGEMENT CONFERENCE AND
RELATED DATES**

Hon. Edward J. Davila

Pursuant to Civil L.R. 6-1(b) and 6-2(a), and subject to the Court's approval, Defendant Grass Valley USA, LLC ("Grass Valley") and Plaintiff Technology Licensing Corporation ("TLC") hereby jointly request that the Court extend the dates currently set with respect to the Case Management Conference ("CMC") scheduled in the above-captioned action.

On March 5, 2013, Grass Valley filed its Declination to Proceed Before a Magistrate Judge and Request for Reassignment to a United States District Judge. (ECF No. 21.) On the same day, the above-captioned action was reassigned from the Honorable Maria-Elena James, United States Magistrate Judge, to the Honorable Edward J. Davila, United States District Judge, for all further proceedings. (ECF No. 23.) On March 6, 2013, the Court issued a notice resetting the CMC to July 12, 2013, and setting July 5, 2013, as the deadline for the parties to file their Joint Case Management Statement. (ECF No. 24.)

On June 18, 2013, TLC informed Grass Valley that it intends to file a motion to amend its complaint to assert two additional patents in this lawsuit. (Lippetz Decl. at ¶ 1.) The parties therefore agree and hereby stipulate that it would be more efficient to postpone the CMC at least 70 days, until it is determined which patents and accused products will be litigated in this lawsuit and the parties' pleadings related to such patents are complete. In particular, having a final resolution on the number and identity of patents in suit, the asserted claims and accused products, will allow the parties to negotiate, and propose for the Court's adoption, an appropriate schedule and scope of discovery in this action.

Accordingly, in order to permit the parties time to finalize the pleadings, the parties hereby stipulate and jointly request that the Court reset and extend the CMC deadlines under the current schedule, as follows:

- Initial CMC: a date convenient to the Court's calendar at least 70 days after the currently scheduled Initial CMC date of July 12, 2013, i.e. no earlier than September 20, 2013; and
- Joint Case Management Statement: 7 days prior to the Initial CMC.

1 The parties further stipulate to extend the date for commencement of discovery to a date
 2 21 days before the extended CMC date, and to extend the date for service of initial disclosures to
 3 seven days before the extended CMC date, both subject to the Court's approval of the extended
 4 CMC date.

5 The requested extension will not affect any other Court dates or deadlines in this case.
 6 This request for extension is further supported by the Declaration of Gregory L. Lippetz, filed
 7 concurrently herewith in accordance with Civil L.R. 6-2(a).

8 **IT IS SO STIPULATED.**

9 Dated: June 26, 2013

Respectfully submitted,

10 JONES DAY

11 By: /s/Gregory L. Lippetz
 12 Gregory L. Lippetz

13 Attorneys for Defendant
 14 GRASS VALLEY USA, LLC

15 **ATTESTATION**

16 I, Gregory L. Lippetz, an ECF User whose ID and password are being used to file this
 17 Joint Stipulation to Extend Deadlines Related to Case Management Conference, in compliance
 18 with Civil L.R. 5-1(i)(3), hereby attest that Joseph N. Hosteny of Niro, Haller & Niro, attorneys
 19 for Technology Licensing Corporation, have concurred with this filing.

20
 21 Dated: June 26, 2013

NIRO, HALLER & NIRO

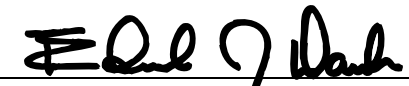
22 By: /s/ Joseph N. Hosteny
 23 Joseph N. Hosteny

24 Attorneys for Plaintiff
 25 TECHNOLOGY LICENSING
 26 CORPORATION

IT IS ORDERED THAT:

The Case Management Conference in this matter is rescheduled for September 20,
2013 at 10:00 AM. The parties shall file a joint case management conference statement on or
before September 13, 2013

DATED: 6/28/2013



HON. EDWARD J. DAVILA
U.S. DISTRICT COURT JUDGE

SVI-127265v1